

**TO:** Wisconsin Chiropractic Examining Board

**FROM:** John Murray, Executive Director  
Wisconsin Chiropractic Association

**DATE:** December 21, 2015

**RE:** Proposed changes to Chir 4 and 10 relating to Courses of Study for and Delegation to Chiropractic Technicians and Chiropractic Radiological Technicians.

Thank you for the opportunity to provide comment on the proposed changes to Chir 4 and 10 related to course of study for chiropractic technicians and chiropractic radiological technicians. We appreciate your attention to more clearly defining the educational standards required of CT's and CRT's. We respectfully submit the following comments for your consideration.

1. The rule appears to be written in a manner that would limit the ability of other properly trained and licensed health care providers to work in a chiropractic office. We request that the rule be clarified to allow appropriately trained and licensed health care providers (i.e. x ray techs, nurses) to work in chiropractic offices with the approval of the CEB.
2. Section 1. Chir 4.04 (3) is repealed. We oppose this change as it eliminates the requirement that the course of instruction for CRT's be approved by the CEB. The CEB should continue to review and approve the course of study for CRT's to ensure quality and consistency.
3. Definition of chiropractic technician course of study. Delete "shall grant" and replace it with "may grant." This gives the CEB the discretion it needs to properly review and approve the credentials of CT applicants. As written, this rule would require a CT to take 67.5 hours of instruction to be licensed. Change the definition from requiring "ALL of the following" to "any of the following." This change preserves the current practice whereby chiropractors and their staff can choose which modules beyond the prerequisite 4.5 hour therapeutic overview they wish to take based on the needs of the practice.
4. (c) 4 hours in physical examination (height, weight, and blood pressure). Change this to "4 hours in preliminary examination/vital signs (height, weight and blood pressure) and add clarifying language stating that the preliminary physical examination is limited to

taking and recording of vital signs and does not include orthopedic or neurological exams.

5. (d) 1 hour in thermotherapy/cryotherapy. Change this to two hours to allow the appropriate time to teach background, familiarization with equipment and procedures, indications and contraindications.
6. (e) 2 hours in mechanical therapy with necessary equipment. Delete “with necessary equipment.” This equipment can vary from office to office and the CT will ultimately need to be trained on the specific piece of equipment in the office.
7. (j) 4 hours in decompression/traction with necessary equipment. Delete this section. Furthermore, clarify the rule to reflect the fact that the act of manual decompression/traction is an adjusting technique that is not delegable to a CT.
8. (2) The course of study shall include a final assessment of competency of the didactic and clinical components of the program. The board should consider adopting a pass/fail standard consistent with the University of Wisconsin standards.
9. (3) The certification program shall have a chiropractor licensed under ch. 446 Stats., present in the facility and available to the students of the course of study. We oppose this language on the basis that it could allow programs to be taught by non-chiropractors and potentially open the door to substandard courses. Chiropractic is a unique health science that is consistently misinterpreted by those without chiropractic training and education.
10. Section 6. Chir 10.02 (1) and (2) are repealed. We oppose this language on the basis that it eliminates the requirement that the course of instruction for Ct’s be approved by the CEB. The CEB should continue to review and approve the course of study for Ct’s and CRT’s to ensure quality and consistency.
11. Section 7 - Definition of chiropractic radiological technician course of study. Delete “shall grant” and replace it with “may grant.” This gives the CEB the discretion it needs to properly review and approve the credentials of CRT applicants.
12. Chir 10.025 (2) – The course of study shall include a final assessment of the competency of the didactic and clinical components of the program. The board should consider adopting a pass/fail standard consistent with the University of Wisconsin standards.